

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE:** : Chapter 13  
**Chaney, William**  
**Chaney, Janet**  
**Debtors/ Respondents** : 16-12050 amc

**RESPONSE TO CERTIFICATE OF DEFAULT**

Debtors, William, and Janet Chaney by and through their undersigned attorney, hereby provides the following response to the Certificate of Default filed by Specialized Loan Servicing LLC as servicer for U.S. Bank National Association, as Trustee for Securitized Asset Backed Receivables LLC Trust 2006-NC2, Mortgage Pass-Through Certificates, Series 2006-NC2 ("Movant"). This response is made without prejudice to debtors' rights to present additional facts or contentions at trial based upon information hereinafter obtained or evaluated. Debtors specifically reserves the right to supplement or amend their responses or present additional facts and contentions at a later date to any of the answers given.

Debtors deny that they have defaulted upon the terms of the Stipulation.

For the reasons set forth above, among others, and based on this Court's authority under the Bankruptcy Code, the Debtors pray that the request for relief be denied and such other relief as is just and proper. . The Debtors specifically reserve the right to supplement the response at or prior to a hearing thereon.

Dated: November 6, 2018

"/s/" Mitchell J. Prince  
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